

T-0055.1

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:****2020 MCGOWEN, L.L.C.,** *Debtor***STALLION FUNDING, L.L.C.,***Movant***vs.****2020 MCGOWEN, L.L.C.,***Respondent***CASE NO. 17-32788-H2-7****CHAPTER 11**

**EXHIBIT AND WITNESS LIST**

**COMES NOW**, Stallion Funding, L.L.C., Creditor, filing this EXHIBIT and WITNESS LIST in connection with the Stallion Funding, L.L.C.'s (1) MOTION FOR RELIEF FROM STAY REGARDING NON-EXEMPT PROPERTY (Lots 1-12, Block 1, Viewpoint Square Replat No. 2) [Doc. 36], (2) MOTION FOR RELIEF FROM STAY REGARDING NON-EXEMPT PROPERTY (Lots 13-17, Block 1, Viewpoint Square Replat No. 2) [Doc. 37] and (3) MOTION FOR RELIEF FROM STAY REGARDING NON-EXEMPT PROPERTY (Lots 18-12, Block 23, Viewpoint Square Replat No. 2) [Doc. 38], currently set for hearing on **Thursday, December 7, 2017, at 2:00 p.m.**, in Judge Jones, Courtroom, United States Courthouse, 515 Rusk, Houston, Texas, 77002.

**EXHIBIT LIST**

| <b>Presiding Judge:</b> | <b>Debtor's Attorney:</b>                               | <b>Creditor's Attorney:</b> |                  |                 |
|-------------------------|---|-----------------------------|------------------|-----------------|
| Hon. David R. Jones     | Larry Vick  | William S. Chesney, III     |                  |                 |
| <b>Hearing Date:</b>    | <b>Courtroom Deputy:</b>                                | <b>Court Reporter:</b>      |                  |                 |
| December 7, 2017        |   |                             |                  |                 |
| <b>EXHIBIT</b>          | <b>DESCRIPTION</b>                                      | <b>OFFERED</b>              | <b>OBJECTION</b> | <b>ADMITTED</b> |
| 1                       | <i>Promissory Note - July 29, 2016 (\$3,550,000.00)</i> |                             |                  |                 |

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|    |   |  |  |  |
|----|---|--|--|--|
| 2  | <i>Deed of Trust</i> – July 29, 2016                            |  |  |  |
| 3  | <i>Payment History</i>  |  |  |  |
| 4  | <i>Promissory Note</i> – Oct. 12, 2015<br>(\$1,375,000.00)      |  |  |  |
| 5  | <i>Deed of Trust</i> – Oct. 12, 2015                            |  |  |  |
| 6  | <i>Payment History</i>  |  |  |  |
| 7  | <i>Promissory Note</i> – Dec. 30, 2015<br>(\$1,659,000.00)      |  |  |  |
| 8  | <i>Deed of Trust</i> – Dec. 30, 2015                            |  |  |  |
| 9  | <i>Payment History</i>  |  |  |  |
| 10 | <i>Photo 9.25.17</i> – Fire Evidence                            |  |  |  |
| 11 | <i>Photo 9.25.17</i> – Fire Evidence, Interior                  |  |  |  |
| 12 | <i>Photo 9.25.17</i> – Fire Evidence                            |  |  |  |
| 13 | <i>Photo 9.25.17</i> – Fire Evidence, Interior                  |  |  |  |
| 14 | <i>Photo 9.25.17</i> – Water Damage, Interior                   |  |  |  |
| 15 | <i>Photo 9.25.17</i> – Water Damage, Interior                   |  |  |  |
| 16 | <i>Photo 9.7.17</i> – Trash                                     |  |  |  |
| 17 | <i>Photo 9.7.17</i> – Trash                                     |  |  |  |
| 18 | <i>Photo 11.13.17</i> – Abandon Bldg                            |  |  |  |
| 19 | <i>Photo 11.13.17</i> – Abandon Bldg, Property                  |  |  |  |
| 20 | <i>Photo 9.7.17</i> – Dead Animals                              |  |  |  |
|    |   |  |  |  |
|    |   |  |  |  |
|    |   |  |  |  |
|    |   |  |  |  |
| 25 | <i>Operating Report</i> , Debtor – July 2017<br>(filed 12.1.17) |  |  |  |
| 26 | <i>Operating Report</i> , Debtor – Aug. 2017<br>(filed 12.1.17) |  |  |  |

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|           |   |  |  |  |
|-----------|---|--|--|--|
| <b>27</b> | <i>Operating Report, Debtor – Sept. 2017</i><br>(filed 12.1.17) |  |  |  |
| <b>28</b> | <i>Operating Report, Debtor – Oct. 2017</i><br>(filed 12.1.17)  |  |  |  |
| <b>29</b> | <i>Operating Report, Debtor – May 2017</i><br>(filed 12.1.17)   |  |  |  |
| <b>30</b> | <i>Trustee's Notice of Deficiencies Ltr.</i><br>(9.19.17)       |  |  |  |

**WITNESS LIST***(Any rebuttal witness or witnesses; Any witness required to authenticate evidence)*

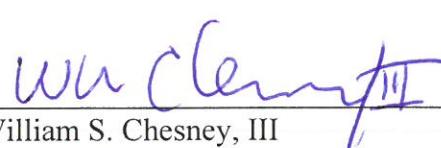
|   |   |
|---|---|
| 1 | Terry Fisher                                    |
| 2 | Vincent Balagia                                 |
| 3 | Rich Marino                                     |
| 4 | Paul Zabal                                      |
| 5 | Hector Duran and/or U.S. Trustee Representative |
| 6 | Debtor Witnesses                                |
|   |   |

**Creditor/Stallion Funding, L.L.C. et. al.** reserves the right to supplement the foregoing List prior to the scheduled hearing in this matter. Creditor further reserves the right to introduce rebuttal Exhibits or testimony from witnesses as deemed necessary.

SIGNED this 5<sup>th</sup> day of December, 2017.

Respectfully submitted,

**FRANK, ELMORE, LIEVENS,  
CHESNEY & TURET, L.L.P.**

  
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William S. Chesney, III  
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Houston, Texas 77024  
Telephone: 713.224.9400  
Facsimile: 713.224.0609  
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**ATTORNEYS FOR CREDITOR**

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**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that a true and correct copy of the foregoing  
WITNESS AND EXHIBIT LIST has been forwarded by ECF and facsimile to:

Larry A. Vick  
10497 Town & Country Way, Ste 700  
Houston, Texas 77024

Hector Duran  
U.S. Trustee's Office  
515 Rusk, Ste. 3516  
Houston, Texas 77002

**SIGNED** this 5<sup>th</sup> day of December, 2017.

  
William S. Chesney, III